

**GREENBERG TRAURIG LLP**

Mark G. Tratos (Bar No. 1086) (*Local Counsel*)  
 F. Christopher Austin (Bar No. 6559) (*Local Counsel*)  
 Ronald D. Green, Jr. (Bar No. 7360) (*Local Counsel*)  
 3773 Howard Hughes Parkway, Ste. 500 North  
 Las Vegas, Nevada 89169  
 Tel: (702) 792-3773  
 Fax: (702) 792-9002

**KRONENBERGER BURGOYNE, LLP**

Karl S. Kronenberger (CA Bar No. 226112) (*Pro Hac Vice*)  
 150 Post Street, Suite #520  
 San Francisco, CA 94018-4707  
 Tel: (415) 955-1155  
 Fax: (415) 955-1158

Attorneys for Plaintiff

**UNITED STATES DISTRICT COURT**

**DISTRICT OF NEVADA**

**ST. MATTHEW'S UNIVERSITY**

**(CAYMAN) LTD., a Cayman Islands  
 company,**

Plaintiff,

vs.

**SABA UNIVERSITY SCHOOL OF  
 MEDICINE FOUNDATION, a Netherland-  
 Antilles company; MEDICAL  
 UNIVERSITY OF THE AMERICAS, a St.  
 Kitts & Nevis company; EDUCATION  
 INFORMATION CONSULTANTS, INC., a  
 Massachusetts corporation;  
 EDUCATIONAL INTERNATIONAL  
 CONSULTANTS, LLC, a Massachusetts  
 limited liability company; PATRICIA L.  
 HOUGH, M.D. an individual, and d.b.a.  
 "Saba University School of Medicine";  
 DAVID L. FREDRICK, an individual;  
 PANKAJ DESAI, M.D., an individual;  
 ASSOCIATION OF AMERICAN  
 INTERNATIONAL MEDICAL  
 GRADUATES, INC., a Nevada  
 corporation, a.k.a. "aaimg@yahoo.com";  
 THOMAS MOORE, M.D. a.k.a.  
 "presaaimg@hotmail.com" and  
 "crocdoc2004@netzero.net," an  
 individual; SARAH B. WEINSTEIN a.k.a.  
 "execsecaaimg@hotmail.com," an  
 individual; RACHAEL E. SILVER, an  
 individual; and DIEDRE MOORE, an  
 individual,**

Defendants.

Case No. 2:05-CV-00848-BES-LRL

**ORDER STAYING PROCEEDINGS**

1 Upon consideration of the Joint Motion Requesting a Stay of All Proceedings, this  
2 Court enters the following Order:

3 **ORDERED, ADJUDGED AND DECREED**

4 1. The Parties' Joint Motion Requesting a Stay of All Proceedings is hereby  
5 granted.

6 2. All matters concerning the present Action as to all Parties shall be stayed to  
7 and including June 30, 2007 (the "Termination Date"). This shall include any discovery or  
8 disclosures, mandatory or discretionary conferences, and any dates scheduled, or dates as  
9 yet to be scheduled, for any pending motions or petitions.

10 3. This Order shall automatically expire upon the Termination Date and all  
11 proceedings shall thereupon recommence, unless extended by further order of the Court  
12 upon motion filed by any party, or the Parties resolve and settle all claims and defenses  
13 presented in the case.

14 4. Any party may move at any time for an order terminating this stay for good  
15 cause shown.

16 5. Nothing in this Order shall be construed or offered as an admission of the  
17 existence of any proper claim or defense to a claim, and all claims and rights shall be tolled  
18 during the requested stay.

19 6. Nothing in this Order shall be deemed to operate as or effect a waiver of any  
20 claims or defenses that any party was entitled to assert prior to the entry of this Order,  
21 including, without limitation, any and all defenses based on lack of personal jurisdiction.

22 7. The due date for any response to any discovery request that occurs while the  
23 case is stayed is hereby enlarged by the amount of time that the case is stayed.

24 /

25 /

26 /

27 /

28 /

1 8. Any and all statutory, common law, rule based, or other deadline that would  
2 otherwise occur during the period of the stay are hereby enlarged by the number of days  
3 that case is stayed.

4 IT IS SO ORDERED

5  
6 UNITED STATES DISTRICT JUDGE

7 DATED: \_\_\_\_\_

8 Respectfully Submitted,

9 **GREENBERG TRAURIG, LLP**

10 By: 

11 Mark G. Tratos  
12 F. Christopher Austin  
13 Ronald D. Green, Jr.  
14 Designated Local Counsel for Plaintiff  
15 ST. MATTHEW'S UNIVERSITY  
16 (CAYMAN) LTD.

GREENBERG TRAURIG, LLP  
3773 Howard Hughes Parkway, Suite 500 North  
Las Vegas, Nevada 89169  
(702) 792-3773  
(702) 792-9002 (fax)

**CERTIFICATE OF SERVICE**

I hereby certify that I served the foregoing **ORDER STAYING PROCEEDINGS** on:

Nathan R. Reinmiller, Esq.  
Alverson, Taylor, Mortensen & Sanders  
7401 West Charleston Boulevard  
Las Vegas, Nevada 89117-1401  
Fax: (702) 385-7000

by causing a full, true, and correct copy thereof to be sent by the following indicated method or methods, on the date set forth below:

- ☒ by mailing in a sealed, first-class postage-prepaid envelope, addressed to the last-known office address of the attorney, and deposited with the United States Postal Service at Las Vegas, Nevada.
- ☐ by hand delivery.
- ☐ by sending via overnight courier in a sealed envelope.
- ☐ by faxing to the attorney at the fax number that is the last-known fax number.
- ☐ by electronic mail to the last known e-mail address.

DATED: February 22, 2007.

  
An employee of Greenberg Traurig, LLP